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CLERK, U.S. DISTRICT COURT

8/1/23

CENTRAL DISTRICT OF CALIFORNIA

BY: V. Figueroa DEPUTY

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 UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

No. CR 23-00149-FMO

Plaintiff,

GOVERNMENT'S EX PARTE APPLICATION
FOR AN ORDER SEALING DOCUMENTS;
DECLARATION OF JENA A. MACCABE

v.

DAEKUN CHO,
 aka "DK,"

Defendant.

Plaintiff United States of America, by and through its counsel
 of record, the United States Attorney for the Central District of
 California and Assistant United States Attorneys Jena A. MacCabe and
 Kevin J. Butler, hereby applies ex parte for an order that Exhibits
 1-5, 11-12, and 18-21 to its opposition to defendant DAEKUN CHO's
 application for review/reconsideration of order of detention be filed
 under seal.

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1 This ex parte application is based upon the attached declaration
2 of Jena A. MacCabe.

3 Dated: July 31, 2023

Respectfully submitted,

4 E. MARTIN ESTRADA
5 United States Attorney

6 MACK E. JENKINS
7 Assistant United States Attorney
8 Chief, Criminal Division

9 /s/
10 JENA A. MACCABE
11 KEVIN J. BUTLER
12 Assistant United States Attorneys

13 Attorneys for Plaintiff
14 UNITED STATES OF AMERICA
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DECLARATION OF JENA A. MACCABE

I, Jena A. MacCabe, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I represent the government in this case.

2. The government requests leave to file Exhibits 1-5, 11-12, and 18-21 to its opposition to defendant DAEKUN CHO's application for review/reconsideration of order of detention under seal. Those exhibits contain sensitive information about the victims in this case, which is subject to the protective order already in place in this matter.

3. On July 31, 2023, the government contacted defense counsel by email requesting his position on sealing the exhibits. Defense counsel responded that he did not object to the exhibits being filed under seal.

4. The government will produce a copy of the exhibits to defendant pursuant to the protective order already in place in this matter.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration is executed at Los Angeles, California, on July 31, 2023.

/s/

JENA A. MACCABE

Assistant United States Attorney